

MOTION FILED

DEC 9 1995

Nos. 95-1858  
96-110

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IN THE SUPREME COURT OF THE UNITED STATES  
OCTOBER TERM, 1995

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DENNIS VACCO, Attorney General  
Petitioner

v

TIMOTHY QUILL, M.D. (and others)  
Respondents

STATE OF WASHINGTON  
Petitioner

v

HAROLD GLUCKSBERG  
Respondent

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ON CERTIORARI TO THE SECOND AND NINTH  
CIRCUIT COURTS OF APPEAL

MOTION TO FILE BRIEF AS AMICUS CURIAE ON  
BEHALF OF WAYNE COUNTY, MICHIGAN, IN SUPPORT  
OF THE PETITIONERS, OUT OF TIME

JOHN D. O'HAIR  
Prosecuting Attorney  
County of Wayne

\*TIMOTHY A. BAUGHMAN  
Chief of Appeals  
1441 St. Antoine  
Detroit, MI 48226  
313 224-5792

\*counsel of record

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MOTION TO FILE AS AMICUS CURIAE OUT OF TIME

NOW COMES Wayne County, Michigan, by John D. O'Hair, the Prosecuting Attorney of the County of Wayne, and Timothy A. Baughman, Chief of Research, Training and Appeals, and requests permission to file as amicus curiae in support of the petitioners out of time, as as reasons says as follows:

1. Amicus Wayne County has stated the reasons for filing as amicus in the brief itself.

2. The brief has itself been filed, and no delay will be occasioned in its consideration or review by the Court.

3. The brief was filed two days after the time for filing by the Petitioners, and an

amicus must file within the time for filing of the party supported. Regrettably, counsel for amicus was unaware of the expedited schedule for filing set for the parties, and apologizes for the delay in filing.

RELIEF

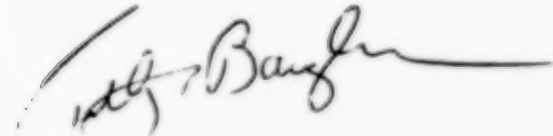
Wherefore, amicus respectfully requests that the motion to file as amicus out of time be granted.

Respectfully submitted,

JOHN D. O'HAIR

Prosecuting Attorney

County of Wayne

A handwritten signature in cursive script, appearing to read "Timothy A. Baughman", with a long horizontal flourish extending to the right.

TIMOTHY A. BAUGHMAN

Chief of Research,

Training and Appeals